

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF TENNESSEE**  
**NORTHEASTERN DIVISION AT GREENEVILLE**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 2:19-CR-196
	)	
MICHAEL WILLIAM SPROLES,	)	
	)	
Defendant.	)	

**SENTENCING MEMORANDUM ON BEHALF OF**  
**DEFENDANT MICHAEL WILLIAM SPROLES**

COMES MICHAEL WILLIAM SPROLES, by and through appointed counsel, and files this Sentencing Memorandum in regards to the sentencing currently scheduled for September 14, 2020. Your Defendant respectfully requests that he be sentenced at the low end of the applicable Guidelines range as ultimately determined by this Court, inasmuch as such sentence will be sufficient, but not greater than necessary, to meet the sentencing objectives set forth in 18 U.S.C. Section 3553(a). Your Defendant pleaded guilty early in the stages of this case, and fully admitted his guilt to the charges against him in the Superseding Indictment to which he is pleading guilty.

Your Defendant also respectfully urges that no fine should be imposed, inasmuch as your Defendant is indigent. (PSIR, R.429, at 19, ¶ 75, Page ID 2091).

Your Defendant further respectfully suggests that he should be given credit for the time that he has already served in federal custody in this cause. Your Defendant will ask at sentencing that this Court recommend to the Bureau of Prisons his placement in one of several potential options for incarceration.

Respectfully submitted this 31st day of August, 2020.

**GULLEY OLDHAM, PLLC**

s/Gerald L. Gulley, Jr. \_\_\_\_\_  
GERALD L. GULLEY, JR., Esq.  
(BOPR 013814)  
Attorney for MICHAEL WILLIAM SPROLES

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document has been filed by electronic case filing (ECF); and that notice of this filing was sent by operation of the Court's said electronic filing system to all parties and counsel of record in this cause who are indicated on the electronic filing receipt.

This the 31st day of August, 2020.

By: s/Gerald L. Gulley, Jr. \_\_\_\_\_  
Attorney